## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

In Re:	) IN CHAPTER 7 PROCEEDINGS
WILLIAM WARREN HOMES,	) BK 13-30927
Debtor(s).	)
DONALD M. SAMSON, Trustee,	)
Plaintiff,	)
vs.	) Adv. 14-03006
SWIFT ROCK FINANCIAL, INC., d/b/a World Law Direct, World Law Group, World Law Plan, World Law Debt Settlement, World Law Debt Debt Services, World Law Options, and World Law Debt Assistance, a Texas corporation; and ORION PROCESSING, LLC, d/b/a World Law Processing and WLD Credit Repair, a Texas Limited liability company	) ) ) ) ) ) ) ) )
Limited liability company,	)
Defendant(s).	)

## **AFFIDAVIT**

DONALD M. SAMSON, being first duly sworn upon his oath, states as follows:

- 1. My name is Donald M. Samson and I am the duly appointed and acting trustee in bankruptcy in the above captioned bankruptcy case.
- 2. That acting through my attorney a Complaint for Fraudulent Transfer was filed against defendants, Swift Rock Financial, Inc., and Orion Processing, LLC.
  - 3. The summons was issued on January 22, 2014.
  - 4. The Court fixed February 22, 2014, as the deadline to file an answer or a motion.
- 5. The Complaint was served on Defendants, Swift Rock Financial, Inc., and Orion Processing, LLC, on January 29, 2014.
  - 6. The summons service executed was filed on January 29, 2014.
- 7. That defendants, Swift Rock Financial, Inc., and Orion Processing, LLC, were served pursuant to the Bankruptcy Rules and have failed to file responsive pleadings within the time required.

8. That according to the debt settlement agreement entered into between debtor, William Warren Homes, and defendant, Swift Rock Financial, Inc., d/b/a/ World Law Debt, defendant, Orion Processing, LLC, d/b/a/ World Law Processing is a division of defendant, Swift Rock Financial, Inc., d/b/a World Law Debt and has the same responsibilities under the debt settlement agreement.

9. This case was commenced on May 16, 2013. Within two years prior to the commencement of the case, debtor transferred to the defendants \$3,475.22 pursuant to a debt settlement agreement entered into between defendants and debtor, William Warren Homes dated 10/8/12. The debtor received no consideration or inadequate consideration in exchange for such transfer and at the time thereof was insolvent or became such as a result of such transfer.

10. Said transfer is fraudulent as to the trustee and may be avoided by him pursuant to 11 U.S.C. § 548.

- 11. That the debtor was insolvent at the time of the transfer.
- 12. That defendants are not in the military service.
- 13. That defendants are not a minor or an incompetent person.
- 14. That the above facts are true in substance and in fact to the best of my knowledge, information and belief.

/s/ Donald M. Samson	_
DONALD M. SAMSON	

SUBSCRIBED AND SWORN to before me, a Notary Public, this 6th day of March, 2014.

/s/ Tara Schaefer	
NOTARY PUBLIC	

My commission expires; August 3, 2016